

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO *ex rel.*)
State Engineer,)
)
Plaintiff,) 69cv07941 - JEC - ACE
)
v.) RIO CHAMA STREAM SYSTEM
)
ROMAN ARAGON, *et al.*,)
) Section 3: Rio Nutrias, Rio Cebolla & Canjilon
) Creek
Defendants.)
_____)

01 NOV 29 2001

**THE UNITED STATES' MOTION
FOR A SIXTY DAY EXTENSION OF TIME**

COMES NOW Defendant the United States and requests a sixty (60) day extension of time in which to file its water rights claims on behalf of the Forest Service and the Bureau of Land Management in Section 3 of this adjudication.

By Order filed on or about Nov. 8, 2001, the Special Master granted the United States request for an extension of time and established a new filing deadline of November 29, 2001. The United States' prior request was premised on the need to obtain formal approval to file the claims. The approval process in Washington has both changed since the United States' request and moved slower than anticipated. Given the new process and allowing for absences in the upcoming holiday season, the United States believes the process can be completed within approximately 60 days.

As with the prior request, Counsel for the United States has contacted Ed Newville, counsel for the State of New Mexico; Mary Humphrey, counsel for the 37 community acequias of La Asociacion de Las Acequias del Rio Vallecitos, Tusas y Ojo Caliente and the El Rito Ditch Association. No objection has been raised to the United States being granted an

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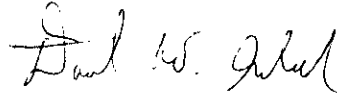
additional 60 days to file its claims. The United States also left a message for John Utton, counsel for the Asociacion de Acequias Nortenas, but did not hear back.

WHEREFORE, the United States respectfully requests that it be granted an extension of time up and including February 4, 2002 to file its claims on behalf of the non-Indian federal agencies in Section 3 of this adjudication. A proposed order granting this motion is enclosed.

Dated this 2nd day of November, 2001

Respectfully submitted,

JOHN C. CRUDEN
Acting Assistant Attorney General



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